

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE TERRORIST ATTACK  
ON SEPTEMBER 11, 2001**

**FEDERAL INSURANCE  
COMPANY, et al,**  
**Plaintiffs,**

**v.**

**AL QAIDA, et al**  
**Defendants**

**CIVIL ACTION NO.: 03 CV 6978**

\* \* \* \* \*

**CROSS-CLAIM AGAINST  
DEFENDANT KHALID SHEIK MOHAMMED**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Khalid Sheik Mohammed, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.
3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION  
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Khalid Sheik Mohammed aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon numerous reputable new sources and the statements of President George W. Bush, Defendant Khalid Sheik Mohammed was “the mastermind of the September 11th attacks.”
7. Thus, Defendant Khalid Sheik Mohammed is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
8. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11, it was without the knowledge of MWL and contrary to the best efforts of MWL to prevent such from happening.
9. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Khalid Sheik Mohammed was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL’s intended purpose.

10. Therefore, if MWL should be held liable for the actions of Defendant Khalid Sheik Mohammed, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Khalid Sheik Mohammed for all sums adjudged against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Khalid Sheik Mohammed in the exact amount of any judgment entered herein against MWL.

SECOND CAUSE OF ACTION  
MISAPPROPRIATION OF FUNDS

11. Cross-claimant MWL hereby repeats and realleges paragraphs one through ten, as if fully recited herein.

12. As Plaintiffs allege herein, various members and/or supporters of Al-Qaeda have abused the charity defendants named herein.

13. Plaintiffs allege that charities, including Defendant MWL, have people in their employ who draw checks on the charity's account, which checks are made payable to fictitious individuals or entities or individuals known to the charity, who have not rendered any services for the charity.

14. Plaintiffs allege that these checks are then cashed and the proceeds thereof are distributed into

an alleged international terrorism fund of some unspecified sort.

15. Plaintiffs allege that the funds are thereafter used to promote Al Qaeda's agenda, i.e., international terrorism.

16. Defendant MWL denies involvement in any aspect of supporting terrorism of any nature, including alleged "cash diversions" from its bank accounts.

17. If such "cash diversions" did occur, which MWL had no knowledge thereof, Defendant Khalid Sheik Mohammed is directly or indirectly responsible for facilitating the occurrence of said "cash diversions."

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Khalid Sheik Mohammed in the amount of all "cash diversions," to be ascertained during discovery.

Respectfully submitted,

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Martin F. McMahon (MM 4389)  
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(202) 862-4343

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**CROSS-CLAIM AGAINST  
DEFENDANT MUSTAFA AHMED AL-HAWSAWI**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Mustafa Ahmed Al-Hawsawi, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.
3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION  
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi transferred funds to the hijackers who carried out the attacks of September 11, 2001.
7. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi was the “paymaster” of the attacks of September 11, 2001.
8. Thus, Defendant Mustafa Ahmed Al-Hawsawi is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
9. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11, it was without the knowledge of MWL and contrary to the best efforts of MWL to prevent such from happening.
10. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Mustafa

Ahmed Al-Hawsawi was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL's intended purpose.

11. Therefore, if MWL should be held liable for the actions of Defendant Mustafa Ahmed Al-Hawsawi, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Mustafa Ahmed Al-Hawsawi for all sums adjudged against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Mustafa Ahmed Al-Hawsawi in the exact amount of any judgment entered herein against MWL.

SECOND CAUSE OF ACTION  
MISAPPROPRIATION OF FUNDS

12. Cross-claimant MWL hereby repeats and realleges paragraphs one through eleven, as if fully recited herein.

13. As Plaintiffs allege herein, various members and/or supporters of Al-Qaeda have abused the charity defendants named herein.

14. Plaintiffs allege that charities, including Defendant MWL, have people in their employ who draw checks on the charity's account, which checks are made payable to fictitious individuals or

entities or individuals known to the charity, who have not rendered any services for the charity.

15. Plaintiffs allege that these checks are then cashed and the proceeds thereof are distributed into an alleged international terrorism fund of some unspecified sort.

16. Plaintiffs allege that the funds are thereafter used to promote Al Qaeda's agenda, i.e., international terrorism.

17. Defendant MWL denies involvement in any aspect of supporting terrorism of any nature, including alleged "cash diversions" from its bank accounts.

18. If such "cash diversions" did occur, which MWL had no knowledge thereof, Defendant Mustafa Ahmed Al-Hawsawi is directly or indirectly responsible for facilitating the occurrence of said "cash diversions."

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Mustafa Ahmed Al-Hawsawi in the amount of all "cash diversions," to be ascertained during discovery.

Respectfully submitted,

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**CROSS-CLAIM AGAINST  
DEFENDANT RAMZI BINALSHIBH**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Ramzi Binalshibh, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.
3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION  
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Ramzi Binalshibh aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon the complaint, Defendant Ramzi Binalshibh assisted terrorist in Hamburg, Germany who later carried out the attacks of September 11, 2001.
7. Based upon the complaint, Defendant Ramzi Binalshibh handled the logistics and finances of the attacks of September 11, 2001.
8. Thus, Defendant Ramzi Binalshibh is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
9. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11, it was without the knowledge of MWL and contrary to the best efforts of MWL to prevent such from happening.

10. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Ramzi Binalshibh was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL's intended purpose.

11. Therefore, if MWL should be held liable for the actions of Defendant Ramzi Binalshibh, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Ramzi Binalshibh for all sums adjudged against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Ramzi Binalshibh in the exact amount of any judgment entered herein against MWL.

SECOND CAUSE OF ACTION  
MISAPPROPRIATION OF FUNDS

12. Cross-claimant MWL hereby repeats and realleges paragraphs one through eleven, as if fully recited herein.

13. As Plaintiffs allege herein, various members and/or supporters of Al-Qaeda have abused the charity defendants named herein.

14. Plaintiffs allege that charities, including Defendant MWL, have people in their employ who draw checks on the charity's account, which checks are made payable to fictitious individuals or

entities or individuals known to the charity, who have not rendered any services for the charity.

15. Plaintiffs allege that these checks are then cashed and the proceeds thereof are distributed into an alleged international terrorism fund of some unspecified sort.

16. Plaintiffs allege that the funds are thereafter used to promote Al Qaeda's agenda, i.e., international terrorism.

17. Defendant MWL denies involvement in any aspect of supporting terrorism of any nature, including alleged "cash diversions" from its bank accounts.

18. If such "cash diversions" did occur, which MWL had no knowledge thereof, Defendant Ramzi Binalshibh is directly or indirectly responsible for facilitating the occurrence of said "cash diversions."

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Ramzi Binalshibh in the amount of all "cash diversions," to be ascertained during discovery.

Respectfully submitted,

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